

Maffey-FINAL

Designation List Report



Maffey, Meghan

2022-12-16

PL Designations	00:12:31
DEF Counter	00:35:51
PL Counter-Counter	00:00:09
TOTAL RUN TIME	00:48:30



Documents linked to video:

P-27

P-73

Maffey-FINAL

DESIGNATION	SOURCE	DURATION	ID
7:13 - 7:16	Maffey, Meghan 2022-12-16	00:00:06	Maffey-FINAL.1
	7:13 I know you've already done this, but I'm going to 7:14 ask, can you state your full name for the record one 7:15 more time, please. 7:16 A. Meghan Maffey.		
8:24 - 9:07	Maffey, Meghan 2022-12-16	00:00:21	Maffey-FINAL.2
	8:24 Are you aware that you've been listed 8:25 as a potential witness for Penn State University in 9:01 Meghan Maffey 9:02 this lawsuit? 9:03 A. Yes. 9:04 Q. Have you ever had communications with the 9:05 attorneys for Penn State, which would be Lucy 9:06 Wheatley or Claire Eller or anyone from the McGuire 9:07 Woods law firm?		
9:15 - 10:16	Maffey, Meghan 2022-12-16	00:01:21	Maffey-FINAL.3
	9:15 THE WITNESS: Yes. 9:16 BY MR. FETTERS: 9:17 Q. When was the first time that you had a 9:18 communication with an attorney from McGuire Woods? 9:19 A. I don't have an exact date. 9:20 Q. What's your best approximation? 9:21 A. Last month. 9:22 Q. Did they reach out to you or did you reach 9:23 out to them? 9:24 A. They reached out to me. 9:25 Q. Was that by phone or email? 10:01 Meghan Maffey 10:02 A. Phone. 10:03 Q. Do you recall who it was specifically? 10:04 A. Claire. 10:05 Q. At the time that Claire reached out to 10:06 you, was she acting as your attorney? 10:07 A. No. 10:08 Q. Had you ever spoken with Claire before 10:09 that phone call? 10:10 A. No. 10:11 Q. Did you discuss Claire representing you in 10:12 any capacity during that phone call? 10:13 A. I don't remember.		

Maffey-FINAL

DESIGNATION	SOURCE	DURATION	ID
	10:14 Q. Was there anyone else on that phone call, 10:15 or was it just you and Claire? 10:16 A. Just me and Claire.		
13:13 - 13:18	Maffey, Meghan 2022-12-16	00:00:20	Maffey-FINAL.4
	13:13 Q. Well, let me just start foundationally 13:14 from what's your understanding of what "licensee" 13:15 means? 13:16 A. Having permission from the University to 13:17 use University-branded logos for apparel and 13:18 anything else.		
15:08 - 15:12	Maffey, Meghan 2022-12-16	00:00:11	Maffey-FINAL.5
	15:08 Q. Before this phone call, this conversation, 15:09 is that something that you even thought about in 15:10 terms of when you reached out to Vintage Brand, 15:11 whether they were a licensed vendor of Penn State or 15:12 not?		
15:13 - 15:14	Maffey, Meghan 2022-12-16	00:00:05	Maffey-FINAL.6
	15:13 A. No. I would say I was -- I did not think 15:14 about it.		
15:22 - 16:18	Maffey, Meghan 2022-12-16	00:01:05	Maffey-FINAL.7
	15:22 Q. I understand you're represented here in 15:23 this deposition by Mr. Snyder; is that correct? 15:24 A. Yes. 15:25 Q. When did that -- what's your understanding 16:01 Meghan Maffey 16:02 of when Mr. Snyder was retained on your behalf; do 16:03 you recall the date? 16:04 A. A few weeks ago. 16:05 Q. Were there any communications related to 16:06 the Penn State case, any communications to you, with 16:07 you, before Mr. Snyder got involved? 16:08 A. No. 16:09 Q. Is it your understanding that Mr. Snyder 16:10 has been retained by the Penn State Alumni 16:11 Association? 16:12 A. Yes. 16:13 Q. Are you paying for Mr. Snyder to represent 16:14 you in this matter? 16:15 A. No.		

Maffey-FINAL

DESIGNATION	SOURCE	DURATION	ID
	16:16 Q. Is that being handled by the Penn State 16:17 Alumni Association, to your knowledge? 16:18 A. Yes.		
16:25 - 17:04	Maffey, Meghan 2022-12-16	00:00:04	Maffey-FINAL.8
🔗 P-27.1.1	16:25 Q. This has been marked as Exhibit 30 at the 17:01 Meghan Maffey 17:02 top. 17:03 (Exhibit Maffey-30 was marked 17:04 for identification.)		
17:08 - 17:12	Maffey, Meghan 2022-12-16	00:00:14	Maffey-FINAL.9
	17:08 Does this look familiar at all? 17:09 A. Yes. 17:10 Q. Is this a copy of a subpoena that you 17:11 received? 17:12 A. Yes, I believe so.		
17:24 - 18:02	Maffey, Meghan 2022-12-16	00:00:11	Maffey-FINAL.10
🔗 P-27.4.1	17:24 Q. Did you search for any of the documents 17:25 requested here at 1, 2, and 3? 18:01 Meghan Maffey 18:02 A. Apologies. I'm just re-reading. Yes, I		
18:03 - 18:03	Maffey, Meghan 2022-12-16	00:00:05	Maffey-FINAL.11
	18:03 have an email that I sent over.		
18:08 - 18:18	Maffey, Meghan 2022-12-16	00:00:25	Maffey-FINAL.12
🔗 P-73.1.1	18:08 Q. I'm going to put up Exhibit 31 here. 18:09 (Exhibit Maffey-31 was marked 18:10 for identification.) 18:11 BY MR. FETTERS: 18:12 Q. We have an initial email, August -- 18:13 actually, that may not be the initial one, but a 18:14 response to an email from you. We'll get into the 18:15 content of these a little bit later. 18:16 I'm going to scroll down and see if 18:17 these are the emails that you are referring to. 18:18 A. Yes.		
18:19 - 18:22	Maffey, Meghan 2022-12-16	00:00:09	Maffey-FINAL.13
	18:19 Q. Are you aware of any other emails besides 18:20 these ones in terms of your communications with 18:21 Vintage Brand? 18:22 A. No.		
 Clear			

Maffey-FINAL

DESIGNATION	SOURCE	DURATION	ID
20:13 - 24:05	Maffey, Meghan 2022-12-16	00:04:03	Maffey-FINAL.14
20:13	Fair to assume you went to Penn State		
20:14	University?		
20:15	A. Yes.		
20:16	Q. What years were you there?		
20:17	A. 2013 to 2017.		
20:18	Q. Did you earn a degree?		
20:19	A. Yes.		
20:20	Q. What was the degree?		
20:21	A. Journalism.		
20:22	Q. Any graduate work?		
20:23	A. No.		
20:24	Q. When you were at Penn State, did you		
20:25	participate in any athletics?		
21:01	Meghan Maffey		
21:02	A. I was a club sport supervisor. So not the		
21:03	D1 athletics; the club teams.		
21:04	Q. And how about, does Penn State have a		
21:05	Greek system?		
21:06	A. They do.		
21:07	Q. Did you participate in the Greek system?		
21:08	A. I did.		
21:09	Q. Which sorority were new?		
21:10	A. Gamma Phi Beta.		
21:11	Q. Any other activities with Penn State, like		
21:12	participation on Panhellenic or participation in		
21:13	other organizations that weren't just strictly, you		
21:14	know, going to classes and things like that?		
21:15	A. Yes.		
21:16	Q. Can you tell me what those were?		
21:17	A. Her Campus at Penn State, The Daily		
21:18	Collegian, Penn State Homecoming, club sports, Gamma		
21:19	Phi Beat. I believe that's it.		
21:20	Q. Daily Collegian, is that the newspaper at		
21:21	Penn State?		
21:22	A. Yes.		
21:23	Q. I take it you were a journalist for		
21:24	that --		
21:25	A. No.		
22:01	Meghan Maffey		

Maffey-FINAL

DESIGNATION	SOURCE	DURATION	ID
22:02	Q. -- periodical?		
22:03	What did you do for the Daily		
22:04	Collegian?		
22:05	A. I photographed. I was a photographer.		
22:06	Q. You mentioned Homecoming. What's entailed		
22:07	in Homecoming? You were on a committee of some		
22:08	sort, presumably?		
22:09	A. Yes. All four years of college.		
22:10	Q. What would that committee do?		
22:11	A. Select the Homecoming -- or select		
22:12	students at the University who had been nominated		
22:13	for Homecoming court, as well as oversee the		
22:14	organizations participating in Penn State		
22:15	Homecoming.		
22:16	Q. I've heard reference to this really big		
22:17	fundraising dance marathon at Penn State.		
22:18	A. Yes.		
22:19	Q. Is that part of Homecoming or something		
22:20	else?		
22:21	A. No. But I was also included -- I also was		
22:22	involved in THON. Apologies.		
22:23	Q. No problem. Can you tell me, just give me		
22:24	a summary -- if someone who's never heard of that,		
22:25	what is that?		
23:01	Meghan Maffey		
23:02	A. Penn State dance marathon is a 46-hour no		
23:03	sitting, no sleeping dance marathon that raises		
23:04	money for kids with cancer for pediatric research at		
23:05	the Hershey Medical Center for the Four Diamonds		
23:06	Fund.		
23:07	Q. And then you mentioned club sports. I		
23:08	think you've already talked about that; is that		
23:09	right?		
23:10	A. Yes.		
23:11	Q. And then Gamma Phi Beta, you've mentioned		
23:12	that as well.		
23:13	Did you have any leadership roles		
23:14	with Gamma Phi Beta?		
23:15	A. Yes. I was philanthropy chair.		
23:16	Q. Sounds like you were pretty involved in		
23:17	college; is that a fair statement?		

Maffey-FINAL

DESIGNATION	SOURCE	DURATION	ID
	23:18 A. Yes. 23:19 Q. A lot of people -- and I say this is true 23:20 of myself -- college is a special time because it 23:21 occurs, you know, in a formative time in people's 23:22 lives. It just really was a special experience for 23:23 many people, not all. 23:24 Would that be true of you, that it 23:25 was a pretty special, formative experience for you? 24:01 Meghan Maffey 24:02 A. Yes. 24:03 Q. Penn State hold a pretty special place in 24:04 your heart? 24:05 A. Of course.		
24:06 - 24:13	Maffey, Meghan 2022-12-16	00:00:21	Maffey-FINAL.15
	24:06 Q. We'll talk a little bit about your 24:07 involvement in the Alumni Association in a minute, 24:08 but I wanted to follow up with you first about your 24:09 employment background. It sounds like you currently 24:10 work with National Geographic; is that right? 24:11 A. Yes. 24:12 Q. What do you do for National Geographic? 24:13 A. I do digital marketing.		
24:14 - 24:19	Maffey, Meghan 2022-12-16	00:00:16	Maffey-FINAL.16
	24:14 Q. If someone's really not familiar with 24:15 digital marketing, could you give just an example of 24:16 what that might entail? 24:17 A. On-air promotions for National Geographic 24:18 channel and National Geographic Wild shows and 24:19 documentaries.		
24:24 - 25:11	Maffey, Meghan 2022-12-16	00:01:07	Maffey-FINAL.17
	24:24 Q. Yeah. I think earlier you touched on your 24:25 job role at National Geographic has some connection 25:01 Meghan Maffey 25:02 to trademark. I was just curious, like, if you 25:03 could explain that a little bit more. How? 25:04 A. Sure. My previous role at National 25:05 Geographic was technical operations where I oversaw 25:06 film distribution for international and domestic 25:07 film festivals and award shows, ensuring that our 25:08 distributors used the yellow border appropriately,		

Maffey-FINAL

DESIGNATION	SOURCE	DURATION	ID
	25:09 making sure that it's National Geographic channel; 25:10 just ensuring that all of the branding and the 25:11 credits was correct, things like that.		
25:19 - 25:24	Maffey, Meghan 2022-12-16	00:00:16	Maffey-FINAL.18
	25:19 Q. Did you receive any training on, you know, 25:20 trademark laws that, you know, this is what 25:21 constitutes a trademark under the law, that type of 25:22 specific legal information? 25:23 A. No. We have a department that does that 25:24 for us.		
25:25 - 26:03	Maffey, Meghan 2022-12-16	00:00:06	Maffey-FINAL.19
	25:25 Q. What is your current title with National 26:01 Meghan Maffey 26:02 Geographic? 26:03 A. Associate project manager of marketing.		
26:13 - 26:15	Maffey, Meghan 2022-12-16	00:00:04	Maffey-FINAL.20
	26:13 Q. Have you ever been employed by 26:14 Pennsylvania State University? 26:15 A. No.		
26:22 - 27:06	Maffey, Meghan 2022-12-16	00:00:24	Maffey-FINAL.21
	26:22 Q. Let's talk a little bit about the DC Penn 26:23 State Alumni Association. I understand you're 26:24 affiliated with that organization; is that correct? 26:25 A. Yes. 27:01 Meghan Maffey 27:02 Q. How so? 27:03 A. I am the president of the DC Metro -- the 27:04 Metro Wash -- I'm the president of Metro Washington, 27:05 DC chapter of the Penn State Alumni Association. 27:06 Apologies. It's long.		
27:07 - 27:12	Maffey, Meghan 2022-12-16	00:00:14	Maffey-FINAL.22
	27:07 Q. No worries. If we just call it "the DC 27:08 Chapter," will that smooth things out? 27:09 A. Yes. 27:10 Q. How long have you been president of the DC 27:11 Chapter? 27:12 A. A year and a half.		
27:13 - 27:19	Maffey, Meghan 2022-12-16	00:00:34	Maffey-FINAL.23
	27:13 Q. As president of the DC Chapter, what's		

Maffey-FINAL

DESIGNATION	SOURCE	DURATION	ID
	27:14 involved in that; what are some of the things that 27:15 you do in that role? 27:16 A. I oversee my Board of Directors and we 27:17 fundraise on behalf of or for our scholarship and 27:18 Penn State THON, as well as I am -- I oversee the 27:19 active alumni in the area.		
27:20 - 30:21	Maffey, Meghan 2022-12-16	00:04:23	Maffey-FINAL.24
	27:20 Q. The DC Chapter of the Penn State Alumni 27:21 Association, about how many members are in that? 27:22 A. Three to 5000. 27:23 Q. Do you have a sense of how that compares 27:24 to other chapters? Is DC a big group, a medium 27:25 group, small group; are you able to quantify in any 28:01 Meghan Maffey 28:02 way like that? 28:03 A. We are one of the largest chapters, I 28:04 believe. 28:05 Q. You've been president for one-and-a-half 28:06 years. Did you have a leadership role before 28:07 becoming president? 28:08 A. Yes. 28:09 Q. What was that? 28:10 A. Communications. 28:11 Q. When did you become the communications 28:12 person for the DC Chapter? 28:13 A. 2020. 28:14 Q. And can you give me a summary of what 28:15 would be involved in serving as the communications 28:16 person? 28:17 A. All communications, all communications 28:18 that are -- or all communication that is sent to the 28:19 alumni in the area, as well as social media; and 28:20 positively, you know, communicating with the alumni 28:21 in the area. 28:22 Q. Before communications, did you have any 28:23 other leadership roles with the DC Chapter? 28:24 A. Yes. 28:25 Q. What were those? 29:01 Meghan Maffey 29:02 A. I was a fundraising lead for DC Diamonds,		

Maffey-FINAL

DESIGNATION	SOURCE	DURATION	ID
	29:03 which is our THON committee for the Alumni		
	29:04 Association.		
	29:05 Q. Do alumni participate in THON also or --		
	29:06 A. Yes.		
	29:07 Q. Is that something that you continue to do		
	29:08 as well?		
	29:09 A. Yes.		
	29:10 Q. Would that be every year?		
	29:11 A. Yes.		
	29:12 Q. Can you explain to me -- I know just a		
	29:13 little bit about it. Does it -- for you to		
	29:14 participate, are you actually going back to Happy		
	29:15 Valley and participating in person there, or are		
	29:16 people able to participate remotely?		
	29:17 A. You can participate both ways.		
	29:18 Q. For you, do you go back to campus to		
	29:19 participate?		
	29:20 A. I do not.		
	29:21 Q. How do you -- how is it done participating		
	29:22 remotely? Do people then, for example, in the DC		
	29:23 area get together, or are they doing it via Zoom,		
	29:24 maybe, with the pandemic?		
	29:25 A. Both. We have done both.		
	30:01 Meghan Maffey		
	30:02 Q. This is actually a dancing marathon where		
	30:03 you have to dance continuously for a long period of		
	30:04 time to raise money; is that how it works?		
	30:05 A. You don't have to dance all 46 hours. You		
	30:06 can -- you are awake for the 46 hours. There's a		
	30:07 lot that goes on during THON.		
	30:08 Q. What's your record for the longest		
	30:09 duration that you danced for THON?		
	30:10 A. I danced my senior year, so I was awake		
	30:11 for 52 hours the year that I danced.		
	30:12 Q. Wow. Impressive.		
	30:13 So you talked about you're a		
	30:14 fundraising lead. You've talked about		
	30:15 communications and presidency. Any other leadership		
	30:16 roles with the DC Chapter?		
	30:17 A. Yes. I was sports chair.		
	30:18 Q. What's involved as a sports chair?		

Maffey-FINAL

DESIGNATION	SOURCE	DURATION	ID
	30:19 A. I work with, I worked with other chapters 30:20 of schools down here to set up rec leagues for 30:21 different sports for our alumni to participate in.		
31:04 - 32:05	Maffey, Meghan 2022-12-16 31:04 Q. So we've got sports chair, fundraising 31:05 lead, communications, president. Any other 31:06 leadership roles? 31:07 A. No. 31:08 Q. When did you first join the DC Chapter? 31:09 A. 2018. 31:10 Q. When you joined, did you immediately take 31:11 a leadership role or did you join as just a member 31:12 at first? 31:13 A. Just a member at first. 31:14 Q. And then when did you start -- I guess, 31:15 would the first leadership role have been sports 31:16 chair? 31:17 A. Mm-hmm. 31:18 Q. When did you start as sports chair? 31:19 A. 2019. 31:20 Q. And the DC alumni chapter, can you give me 31:21 a sense of some of the activities that are put on? 31:22 I understand the pandemic has maybe changed things a 31:23 little bit. But, you know, are there watch parties, 31:24 social, happy hours, things -- can you give me a 31:25 sense of, like, what's involved with the chapter? 32:01 Meghan Maffey 32:02 A. Sports, community service projects, Penn 32:03 State dance marathon fundraisers, watch parties for 32:04 football, happy hours, and professional development 32:05 opportunities.	00:01:24	Maffey-FINAL.25
32:06 - 32:08	Maffey, Meghan 2022-12-16 32:06 Q. Do you get compensated, paid in any way, 32:07 for your work with the DC Chapter? 32:08 A. No.	00:00:06	Maffey-FINAL.26
32:09 - 32:21	Maffey, Meghan 2022-12-16 32:09 Q. So it sounds like you're very involved 32:10 holding multiple leadership positions. I would 32:11 imagine you've donated a lot of your time to this 32:12 organization; is that accurate?	00:00:51	Maffey-FINAL.27

Maffey-FINAL

DESIGNATION	SOURCE	DURATION	ID
	32:13 A. Yes. 32:14 Q. So, I guess, my question is why donate all 32:15 your time in this way? 32:16 A. To refer back to what you had mentioned 32:17 previously, I spent -- I was very involved at Penn 32:18 State while I was at the University. You asked me 32:19 if Penn State held a special place in my heart, and 32:20 it does. And I continue to -- I want to give back 32:21 to the University that has given so much to me.		
35:09 - 35:22	Maffey, Meghan 2022-12-16	00:00:39	Maffey-FINAL.28
	35:09 So if I wear a shirt that has the 35:10 logo of the university I went to, part of the reason 35:11 I do it is because I want people to know I like that 35:12 school, I want people to know I went to that school. 35:13 When you wear Penn State apparel with Penn State 35:14 logos on it, do you do it for that same reason? 35:15 A. No. 35:16 Q. Why do you do it? 35:17 A. As I previously mentioned, I have a lot of 35:18 school spirit. 35:19 Q. Is it fair to say then that when you wear 35:20 apparel decorated with Penn State logos, it's to 35:21 express your school spirit? 35:22 A. Yes.		
35:24 - 37:07	Maffey, Meghan 2022-12-16	00:01:58	Maffey-FINAL.29
	35:24 Let's talk a little bit about Vintage 35:25 Brand. You touched on this a little bit earlier, 36:01 Meghan Maffey 36:02 but I want to go back and flesh out some of those 36:03 details. If I recall correctly, I think you said 36:04 that you first heard about Vintage Brand because 36:05 another Alumni Association for another Big Ten 36:06 school was aware of Vintage Brand; is that right? 36:07 A. Yes. Yes. 36:08 Q. Can you tell me a little bit more about 36:09 that? Was there some email exchange between you and 36:10 that other person or a phone call? Can you tell me 36:11 a little bit more about how you became aware of 36:12 Vintage Brand? 36:13 A. We put on a Big Ten DC event and they had		

Maffey-FINAL

DESIGNATION	SOURCE	DURATION	ID
	36:14 reached out to their contact at Vintage Brand and 36:15 that -- and that's how I learned. 36:16 Q. Then after you learned of that, what did 36:17 you do; did you go to Vintage Brand's website 36:18 yourself? 36:19 A. I did. 36:20 Q. Do you recall roughly when this might have 36:21 been? I think your emails were in the summer of 36:22 2022. We can take a look at those. Would that have 36:23 been around the time you went to Vintage Brand's 36:24 website? 36:25 A. Yes. 37:01 Meghan Maffey 37:02 Q. At that time did you observe any product 37:03 offerings that were related to Penn State? 37:04 A. Yes. 37:05 Q. So in the summer of 2022 -- I'm going to 37:06 put up this exhibit again just to get a better sense 37:07 of the dates. If I scroll down -- this is		
37:08 - 37:17	Maffey, Meghan 2022-12-16	00:00:28	Maffey-FINAL.30
🔗 P-73.1.2	37:08 Exhibit 31. We have -- sort of at the bottom of 37:09 this page there's an email. It looks like your 37:10 name, Meg Maffey, at the bottom under "All the 37:11 best." 37:12 Do you see that? 37:13 A. Yes. 37:14 Q. Is this the initial communication that you 37:15 had with Vintage Brand, or was there anything that 37:16 preceded this? 37:17 A. That's it.		
37:18 - 38:02	Maffey, Meghan 2022-12-16	00:00:25	Maffey-FINAL.31
🔗 P-73.1.3	37:18 Q. There's a response from someone named Jay 37:19 L. above that. Do you see that? 37:20 A. Yes. 37:21 Q. The date there is August 1, 2022. That's 37:22 at the top right; is that right? 37:23 A. Yes. 37:24 Q. Do you know if he responded that same day 37:25 that you sent that message? 38:01 Meghan Maffey		

Maffey-FINAL

DESIGNATION	SOURCE	DURATION	ID
	38:02 A. I don't recall.		
38:03 - 38:24 P-73.1.1	Maffey, Meghan 2022-12-16	00:01:16	Maffey-FINAL.32
	38:03 Q. If this communication occurred August 1,		
	38:04 2022 or thereabouts, is it your sense, then, that		
	38:05 you would have visited and reviewed the Vintage		
	38:06 Brand website perhaps in late July 2022?		
	38:07 A. Yes.		
	38:08 Q. Or possibly August 1, 2022, the same day?		
	38:09 A. Yes.		
	38:10 Q. Would that have been your first time		
	38:11 reviewing the Vintage Brand website?		
	38:12 A. Yes.		
	38:13 Q. You specifically recall looking at product		
	38:14 offerings related to Penn State during this time?		
	38:15 A. Yes.		
	38:16 Q. Can you give me an example of some of the		
	38:17 artwork that you recall seeing on the Vintage Brand		
	38:18 website as it relates to Penn State?		
	38:19 A. Yes. There was branded T-shirts,		
	38:20 sweatshirts, and long sleeves is what I recall.		
	38:21 Q. When you say "branded," do you mean like		
	38:22 the logos and things like that related to Penn		
	38:23 State?		
	38:24 A. Yes.		
38:25 - 39:04	Maffey, Meghan 2022-12-16	00:00:15	Maffey-FINAL.33
	38:25 Q. Which ones specifically do you recall		
	39:01 Meghan Maffey		
	39:02 seeing?		
	39:03 A. God. I can't recall which one.		
	39:04 Q. None at all?		
39:05 - 39:10	Maffey, Meghan 2022-12-16	00:00:25	Maffey-FINAL.34
	39:05 A. I can't recall -- I can't confirm which		
	39:06 one, but I don't want you to -- I don't -- it would		
	39:07 be...		
	39:08 Q. It's okay if you can't recall. "I don't		
	39:09 know" or "I can't recall" is a perfectly fine		
	39:10 answer, if that's true.		
39:11 - 43:07	Maffey, Meghan 2022-12-16	00:06:13	Maffey-FINAL.35
	39:11 A. The paw print and the chipmunk logo.		

Maffey-FINAL

DESIGNATION	SOURCE	DURATION	ID
	39:12 Q. If someone's not familiar what either of 39:13 those might refer to, can you describe what the paw 39:14 print logo looks like? 39:15 A. It is the Penn State paw print. It's navy 39:16 and white, as every Penn State logo is. It has a 39:17 slash or a white -- the line, rounded line in the 39:18 left, I believe the left side. But it is the Penn 39:19 State paw print. 39:20 Q. And the other one you mentioned was the 39:21 chipmunk logo, I think. What's that one look like? 39:22 A. It is the lion head, it is the Penn State 39:23 lion head. 39:24 Q. It's like a profile of the lion head; is 39:25 that right? 40:01 Meghan Maffey 40:02 A. Correct. 40:03 Q. When you visited Vintage Brand's website, 40:04 how did you actually arrive at the website; was it a 40:05 Google Search? Did you type in a specific URL to 40:06 arrive there? Do you recall how you arrived at the 40:07 website? 40:08 A. I don't recall. 40:09 Q. Do you recall looking at a home page first 40:10 or did you go immediately into web pages that were 40:11 related to Penn State? 40:12 A. Home page. 40:13 Q. Do you recall anything about how the home 40:14 page was organized, the look of it, the information 40:15 that was contained there? 40:16 A. It had colleges. It had a few titles that 40:17 you could click on at the top, football, baseball, 40:18 and colleges, as well as Vintage Brand's name across 40:19 the top of the screen. 40:20 Q. When you -- how did you then go about 40:21 navigating; once you landed at the home page, what 40:22 did you do next? 40:23 A. I clicked on colleges and found Penn State 40:24 University. 40:25 Q. Did you click on any of the tabs to just 41:01 Meghan Maffey 41:02 have a look around and see what else was on the		

Maffey-FINAL

DESIGNATION	SOURCE	DURATION	ID
	41:03 website?		
	41:04 A. No.		
	41:05 Q. So just went to the home page and then the		
	41:06 Penn State tab; is that right?		
	41:07 A. Home page, colleges, Penn State.		
	41:08 Q. And then from there what did you do?		
	41:09 A. Scrolled to see what was, what Vintage		
	41:10 Brands had to offer with Penn State's logo on it,		
	41:11 and then exited.		
	41:12 Q. Did you use the website, Vintage Brand		
	41:13 website to obtain contact information for the emails		
	41:14 that you sent, or did you have that already?		
	41:15 A. I don't recall.		
🔗 P-73.1.1	41:16 Q. Going back to Exhibit 31, which I think is		
	41:17 still on your screen there. It looks like the email		
	41:18 address that you were using is pennstateedc@gmail,		
	41:19 [sic]; is that right?		
	41:20 A. It's pennstateedc@gmail.com.		
	41:21 Q. Thank you.		
	41:22 Then it looks like these were emails		
	41:23 to customerservice@shopvintagebrand.com. Did you		
	41:24 send an email or did you use -- I think Vintage		
	41:25 Brand has, like, a chat, a live chat function as		
	42:01 Meghan Maffey		
	42:02 well. Do you recall how you communicated with		
	42:03 Vintage Brand?		
	42:04 A. Email.		
	42:05 Q. Email. And I want to make sure I have a		
	42:06 good understanding of this. You touched on it		
	42:07 already. But you don't recall whether you got this		
	42:08 email address customerservice@shopvintagebrand.com,		
	42:09 whether you got that email address based on your		
	42:10 review of the website versus something else?		
	42:11 A. Correct.		
	42:12 Q. Is it possible that your contact with the		
	42:13 Washington DC alumni chapter for the other school		
	42:14 gave you this email address?		
	42:15 A. Yes.		
	42:16 Q. Would you have that in -- if you were to		
	42:17 search your email or this email address, would you		
	42:18 be able to search that to find out if the person		

Maffey-FINAL

DESIGNATION	SOURCE	DURATION	ID
	42:19 from the other Big Ten school actually supplied you 42:20 with this email address? 42:21 A. Probably. 42:22 Q. Did you reach out to any other online 42:23 retailers or otherwise, any other companies in 42:24 relation to this request in the summer of 2022 of 42:25 trying to get some products for an event? 43:01 Meghan Maffey 43:02 A. Yes. 43:03 Q. How many other companies did you reach out 43:04 to? 43:05 A. Over a hundred. 43:06 Q. Can you give me some examples of which 43:07 companies would be entailed in that over a hundred? 		
43:08 - 43:16	Maffey, Meghan 2022-12-16	00:00:47	Maffey-FINAL.36
	43:08 A. The Student Bookstore, Lion's Pride, local 43:09 restaurants and bars in DC, our Penn State watch 43:10 party bars. That's a few. 43:11 Q. How many can you recall that were 43:12 companies that sold apparel? 43:13 A. A handful. 43:14 Q. Do you remember the names specifically? 43:15 A. Lion's Pride, Student Bookstore, 43:16 McLanahan's. 		
43:17 - 44:25	Maffey, Meghan 2022-12-16	00:01:46	Maffey-FINAL.37
	43:17 Q. Lion's Pride, what is that? 43:18 A. A local Penn State store downtown. 43:19 Q. Does Lion's Pride also have a website, or 43:20 is it just brick and mortar only? 43:21 A. I believe they have a website. 43:22 Q. You said the Bookstore, Penn State 43:23 Bookstore is, I assume, what you're referring to 43:24 there; is that true? 43:25 A. Yes. 44:01 Meghan Maffey 44:02 Q. And the Penn State Bookstore, they have a 44:03 website as well where you can purchase apparel 44:04 online? 44:05 A. Yes. 44:06 Q. Did you -- for these other apparel		

Maffey-FINAL

DESIGNATION	SOURCE	DURATION	ID
	<p>44:07 companies, did you also look at their websites and</p> <p>44:08 their product offerings before reaching out to those</p> <p>44:09 companies?</p> <p>44:10 A. Yes.</p> <p>44:11 Q. Is it possible that when -- you testified</p> <p>44:12 earlier that you recall looking at Vintage Brand's</p> <p>44:13 product offerings and you recalled seeing two of</p> <p>44:14 those logos that we talked about. Is it possible</p> <p>44:15 that you're thinking of one of those other</p> <p>44:16 companies, or are you pretty firm that you recall</p> <p>44:17 seeing those on Vintage Brand's website?</p> <p>44:18 A. I am pretty confident that it is -- that</p> <p>44:19 it was those on Vintage Brand's website.</p> <p>44:20 Q. How many websites do you recall looking at</p> <p>44:21 as you were sending out these emails to about a</p> <p>44:22 hundred or so companies in the summer of 2022?</p> <p>44:23 A. A hundred.</p> <p>44:24 Q. So you looked at a hundred websites?</p> <p>44:25 A. Yes.</p>		
45:15 - 46:04	Maffey, Meghan 2022-12-16	00:00:47	Maffey-FINAL.38
	<p>45:15 Q. Ms. Maffey, we're, I think, getting close</p> <p>45:16 here. I just have a few additional questions. I'm</p> <p>45:17 going to put Exhibit 31 back up. Bear with me one</p> <p>45:18 second. Do you see this on your screen?</p> <p>45:19 A. Yes.</p> <p>45:20 Q. So Exhibit 31, these are the email</p> <p>45:21 communications with Vintage Brand in summer of 2022.</p> <p>45:22 And go ahead and take a moment and read this to</p> <p>45:23 yourself just so you're familiar with the content</p> <p>45:24 and I'll ask you a follow-up question once you're</p> <p>45:25 done.</p> <p>46:01 Meghan Maffey</p> <p>46:02 A. I'm good. I've re-read it.</p> <p>46:03 Q. I apologize. I probably already asked you</p> <p>46:04 this, but I was wracking my brain whether I did:</p>		
46:05 - 46:16	Maffey, Meghan 2022-12-16	00:00:48	Maffey-FINAL.39
	<p>46:05 Can you just summarize, basically, what it is that</p> <p>46:06 you were asking for from Vintage Brand?</p> <p>46:07 A. Yes. A donation from Vintage Brand to be</p> <p>46:08 raffled off at one of our four watch parties that we</p>		

Maffey-FINAL

DESIGNATION	SOURCE	DURATION	ID
	46:09 hosted this football season for the -- and the funds 46:10 that are raised through these raffles from these 46:11 donations is donated directly back to Penn State, 46:12 first-year Penn State students who need financial 46:13 aid. 46:14 So our chapter raises funds to donate 46:15 money towards Washington, DC, the DMV area students 46:16 who apply through our scholarship award program.		
46:17 - 48:03	Maffey, Meghan 2022-12-16	00:01:51	Maffey-FINAL.40
🔗 P-73.1.3	46:17 Q. And after your communication, the message 46:18 from Jay L. was: Thank you for your interest in 46:19 Vintage Brand. We have forwarded your information 46:20 to the appropriate internal department. If they are 46:21 interested, they will be in contact. 46:22 Did I read that correctly? 46:23 A. Yes. 46:24 Q. As we already discussed at the top of 46:25 that, there's a date line of August 1, 2022. If we 47:01 Meghan Maffey 🔗 P-73.2.1		
	47:02 scroll down in Exhibit 31, there's a message from 47:03 the pennstatedc@gmail.com address and that one's 47:04 dated July 31, 2022. 47:05 Do you see that? 47:06 A. Yes. 47:07 Q. And then there's some content below as 47:08 well. This one is to partners@vintagebrand.com. Do 47:09 you know how you got that email address, 47:10 partners@vintagebrand.com? 47:11 A. I don't recall. 🔗 P-73.1.3		
	47:12 Q. But if we go back up, at least the 47:13 response earlier was coming from 47:14 customerservice@shopvintagebrand.com. Do you see 47:15 that? 47:16 A. I do. 47:17 Q. Do you know if your initial communication 47:18 was to customerservice@shopvintagebrand.com versus 47:19 partners@vintagebrand.com? 47:20 A. I don't recall. 47:21 Q. In this email -- this is written by you, 47:22 yes?		

Maffey-FINAL

DESIGNATION	SOURCE	DURATION	ID
 P-73.1.1	47:23 A. Yes. It's the same email as above. 47:24 Q. So is it -- I was going to ask, is this 47:25 basically a copy and paste of the earlier 48:01 Meghan Maffey 48:02 communication? 48:03 A. It's the exact same email.		
48:04 - 48:18	Maffey, Meghan 2022-12-16	00:00:33	Maffey-FINAL.41
 P-73.4.1	48:04 Q. There's another communication from 48:05 pennstatedc@gmail.com, again, to 48:06 partners@vintagebrand.com. This one, though, is 48:07 dated August 14, 2022. 48:08 Do you see that? 48:09 A. Yes. 48:10 Q. And the message is: I wanted to circle 48:11 back and see if you would be interested in 48:12 participating and donating for this upcoming 48:13 football season. 48:14 Did I read that correctly? 48:15 A. Yes. 48:16 Q. Did you ever hear back from Vintage Brand 48:17 other than this first response from Jay L.? 48:18 A. No.		
48:19 - 51:10	Maffey, Meghan 2022-12-16	00:04:29	Maffey-FINAL.42
 Clear	48:19 Q. This message here, I noticed that if you 48:20 see on your screen, Exhibit 31, it's the message 48:21 that Jay L. responded to, did you send a similar 48:22 message like this to those other companies you 48:23 mentioned reaching out to? 48:24 A. Yes. I sent the same email. 48:25 Q. Exact same email? 49:01 Meghan Maffey 49:02 A. Exact same email. 49:03 Q. With a hundred companies you were reaching 49:04 out to, you talked about volunteering your time, I 49:05 would imagine you were trying to do this as 49:06 efficiently and quickly as possible; is that fair? 49:07 A. No. 49:08 Q. Why send the exact same email to all of 49:09 those companies then? 49:10 A. I had a lot of emails to send to different		

Maffey-FINAL

DESIGNATION	SOURCE	DURATION	ID
	49:11 companies; however, I took time and researched 49:12 companies that sold Penn State items. But to say 49:13 that I was doing it as quickly as possible and 49:14 efficiently is incorrect.		
	49:15 Q. Tell me a little bit about the research 49:16 that you did. Can you explain that to me? How 49:17 would you go about doing the research on the 49:18 companies that you reached out to?		
	49:19 A. I researched companies that were owned by 49:20 Penn State different alumni; reached out to Penn 49:21 State businesses in State College; researched 49:22 companies that sold college apparel and college 49:23 items, as well as companies that were owned by Penn 49:24 State alumni.		
	49:25 Q. What were you looking for specifically 50:01 Meghan Maffey 50:02 when you were doing this research?		
	50:03 A. Any items to be donated, as mentioned 50:04 previously, to raffle off to our alumni and our -- 50:05 and anyone who came to any of our events to raise 50:06 funds for students who need financial aid in the 50:07 Washington, DC, metro area as they enter their first 50:08 year of Penn State University.		
	50:09 Q. I mean, when you were researching these 50:10 companies before reaching out to them, you talked 50:11 about, you know, looking for companies that were 50:12 owned by Penn State alumni, for example. But other 50:13 than that, those things that you identified, were 50:14 you researching for anything else in particular?		
	50:15 A. Are you asking if I was researching for a 50:16 specific item?		
	50:17 Q. Could be a specific item, but anything 50:18 else that you considered when you were looking. For 50:19 example, if you found one company online but then 50:20 decided no, I'm not going to ask them; you know, 50:21 what would have been the reason for that is kind of 50:22 what I'm getting at?		
	50:23 A. If they were not, if they did not have 50:24 anything that had Penn State, Penn State's -- if the 50:25 company has Penn State items and apparel on their 51:01 Meghan Maffey		

Maffey-FINAL

DESIGNATION	SOURCE	DURATION	ID
	51:02 website, that is what I was looking for; however, 51:03 there was a company that was owned by a Penn-Stater 51:04 and she donated something that was not related to 51:05 Penn State. 51:06 Q. I understand. That makes sense now. 51:07 Anything else like that that went 51:08 into your evaluation, or is what you've described 51:09 basically it? 51:10 A. That's it.		
52:03 - 52:09	Maffey, Meghan 2022-12-16	00:00:26	Maffey-FINAL.43
	52:03 Following up on what Mr. Fetter was 52:04 just asking you, when you were reviewing companies 52:05 to possibly ask for donations, did it matter to you 52:06 whether the company was authorized to use Penn 52:07 State's logos? Or maybe the better question is, 52:08 would it matter -- have mattered to you if a company 52:09 was not authorized to use Penn State's logos?		
52:10 - 52:13	Maffey, Meghan 2022-12-16	00:00:19	Maffey-FINAL.44
	52:10 A. I wouldn't -- I don't think that I would 52:11 be comfortable accepting a donation that has Penn 52:12 State branded -- like Penn State's logo on it if not 52:13 authorized by the University.		
52:14 - 53:10	Maffey, Meghan 2022-12-16	00:01:06	Maffey-FINAL.45
	52:14 Q. So we were talking about when you've 52:15 reviewed the Vintage Brand website. Going back a 52:16 little bit, it sounds like prior to August of this 52:17 year you had heard about Vintage Brand before that, 52:18 based on your contact with the other Big Ten 52:19 Universities, correct? 52:20 A. Yes. 52:21 Q. Is it possible that you had looked at the 52:22 Vintage Brand website before August of this year 52:23 when you were, when you were having those dealings 52:24 with the other Big Ten school? 52:25 A. No. I had never heard of Vintage Brand 53:01 Meghan Maffey 53:02 before, before the event with the other Big Ten 53:03 leaders. 53:04 Q. I'm sorry. Was that event, was that the 53:05 event that occurred in August of 2022?		

Maffey-FINAL

DESIGNATION	SOURCE	DURATION	ID
	53:06 A. Yes. 53:07 Q. When you visited the Vintage Brand 53:08 website, did you look at any other, any pages 53:09 related to schools other than Penn State? 53:10 A. No.		
54:03 - 54:13	Maffey, Meghan 2022-12-16	00:00:34	Maffey-FINAL.46
	54:03 Q. When you visited it, there was -- you've 54:04 testified -- I want to make clear. When you visited 54:05 it, there was a page for Penn State gear available? 54:06 A. Yes. 54:07 Q. Is that right? 54:08 A. Yes. 54:09 Q. Do you remember if any of the products you 54:10 saw on that page had the words "Penn State" on it, 54:11 on them? 54:12 A. I can't recall "Penn State," but -- I 54:13 can't recall "Penn State."		
54:14 - 54:15	Maffey, Meghan 2022-12-16	00:00:04	Maffey-FINAL.47
	54:14 Q. Is it possible? 54:15 A. Yes. Of course.		
54:16 - 54:22	Maffey, Meghan 2022-12-16	00:00:26	Maffey-FINAL.48
	54:16 Q. Do you remember if you saw any products 54:17 for sale that had -- I'm going to call it the 54:18 university seal, which you might know what I mean? 54:19 It's the circle with, you know, the horses and 54:20 stuff. Did you see any products on the Vintage 54:21 Brand site that had that Penn State seal on them? 54:22 A. I can't recall.		
54:23 - 54:24	Maffey, Meghan 2022-12-16	00:00:05	Maffey-FINAL.49
	54:23 Q. Is it possible? 54:24 A. Yes.		
54:25 - 55:13	Maffey, Meghan 2022-12-16	00:00:47	Maffey-FINAL.50
	54:25 Q. When you looked -- setting aside any 55:01 Meghan Maffey 55:02 recent review you've done going back to when you 55:03 looked at the Vintage Brand website, did you see any 55:04 language on the website speaking to whether Vintage 55:05 Brand has any affiliation or relationship to Penn 55:06 State?		

Maffey-FINAL

DESIGNATION	SOURCE	DURATION	ID
	55:07 A. No. 55:08 Q. Did you see any language that you might 55:09 consider legalese or a disclaimer on the website? 55:10 A. No. 55:11 Q. And was it your impression that Vintage 55:12 Brand was authorized to use Penn State's trademarks? 55:13 A. Yes.		
55:14 - 55:19	Maffey, Meghan 2022-12-16	00:00:22	Maffey-FINAL.51
	55:14 Q. You spoke a little bit about how you have 55:15 a lot of Penn State spirit and you devote a lot of 55:16 your time to the University and the Alumni Club. I 55:17 just want to confirm with you, the testimony you've 55:18 given today, has it all been true and accurate? 55:19 A. Yes.		
55:20 - 55:24	Maffey, Meghan 2022-12-16	00:00:17	Maffey-FINAL.52
	55:20 Q. And Penn State has not -- correct me if 55:21 I'm wrong, Penn State or the Alumni Club have not 55:22 given you any incentive or persuaded you to testify 55:23 in one -- or give certain answers; is that correct? 55:24 A. Yes. They have not done any of that.		
56:10 - 56:22	Maffey, Meghan 2022-12-16	00:00:46	Maffey-FINAL.53
	56:10 Q. Just briefly, Ms. Maffey, Ms. Eller just 56:11 asked you about other logos and designs. But I want 56:12 to make sure we have a clear record. The only logos 56:13 and designs that you actually recall seeing on the 56:14 Vintage Brand website were the paw print design and 56:15 the chipmunk design; is that what you testified to 56:16 earlier today? 56:17 A. Yes. 56:18 Q. We also talked about early in the 56:19 deposition, we talked about that initial phone call 56:20 you had with Ms. Eller. Do you recall that 56:21 testimony earlier today? 56:22 A. Yes.		
57:04 - 57:09	Maffey, Meghan 2022-12-16	00:00:20	Maffey-FINAL.54
	57:04 Q. Yeah. In the earlier testimony I asked -- 57:05 we talked about how Ms. Eller mentioned on the phone 57:06 that Vintage Brand wasn't authorized to sell Penn 57:07 State products. And I asked before she said that on		

Maffey-FINAL

DESIGNATION	SOURCE	DURATION	ID
	57:08 the phone, was that something that you even thought 57:09 about, and I believe you said no.		
57:10 - 57:12	Maffey, Meghan 2022-12-16	00:00:32	Maffey-FINAL.55
	57:10 A. I -- with my knowledge of Penn State and 57:11 Penn State athletics, and spending four years at 57:12 a -- at the University, apologies, I in good faith		
57:13 - 58:02	Maffey, Meghan 2022-12-16	00:01:01	Maffey-FINAL.56
	57:13 would -- and -- can I rephrase everything I just 57:14 said? 57:15 Q. Sure. 57:16 A. I, I did not -- you're correct, I did not 57:17 think about the licensing, as my experience with 57:18 Penn State licensing is that if it has the logo on 57:19 it, it's trademarked through the University. 57:20 Q. So is it fair to say, and correct me if 57:21 it's not accurate, is it fair to say that you have 57:22 an assumption that if an item of apparel makes 57:23 reference to Penn State, that Penn State owns that 57:24 reference and it must be licensed; is that sort of 57:25 your operating assumption? 58:01 Meghan Maffey 58:02 A. Yes.		

PL Designations	00:12:31
DEF Counter	00:35:51
PL Counter-Counter	00:00:09
TOTAL RUN TIME	00:48:30



Documents linked to video:

P-27

P-73